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**VIA ECF**

March 4, 2022

The Honorable Sarah Netburn  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: *Ukraine v. PAO Tatneft*, No. 1:21-mc-00376-JGK-SN  
*Ukraine v. PAO Tatneft*, No. 1:22-mc-00036-JGK-SN**

Dear Judge Netburn:

Due to the war in Ukraine, the parties jointly move for a moratorium on discovery and all related proceedings before this Court in Cases 21-mc-00376 and 22-mc-00036, consistent with the parties' right to modify ordinary discovery procedures by stipulation, pursuant to the inherent authority of the Court, and in the interest of justice. *See* Fed. R. Civ. P. 29(b); *Landis v. N. Am. Co.*, 299 U.S. 248, 254 (1936).

The parties agree that briefing on Ukraine's Amended Motion in Case 22-mc-00036 (Dkt. 25) should be stayed in the interest of justice. Tatneft has further stipulated that compliance with the third-party subpoena in both cases should be tolled until further order of the Court.

Accordingly, the parties respectfully request entry of the accompanying proposed orders regarding the requested stay of proceedings.

Respectfully submitted,

/s/ Maria Kostytska  
Maria Kostytska, Partner  
WINSTON & STRAWN LLP  
*Counsel for Ukraine*

/s/ Lauren K. Handelsman  
Lauren K. Handelsman, Partner  
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*Counsel for PAO Tatneft*

Cc: The Honorable John G. Koeltl (via ECF)  
All Counsel of Record (via ECF)